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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re: PG&E CORPORATION and
PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

No. 20-CV-04567 HSG

**STIPULATION AND
ORDER ENLARGING TIME
TO FILE SECURITIES
PLAINTIFFS-APPELLANTS'
BRIEF IN OPPOSITION TO
THE TCC'S MOTION TO
DISMISS**

On Appeal from the United States
Bankruptcy Court for the Northern
District of California, Chapter 11
Case No. 19-30088 (DM) (Lead
Case) (Jointly Administered)

1 WHEREAS:

2 Public Employees Retirement Association of New Mexico (“PERA”), York
3 County on behalf of the County of York Retirement Fund, City of Warren Police
4 and Fire Retirement System, and Mid-Jersey Trucking Industry & Local No. 701
5 Pension Fund (collectively, “Securities Plaintiffs-Appellants” or “Securities
6 Plaintiffs”), commenced this bankruptcy appeal on July 2, 2020;

7 On September 3, 2020, Securities Plaintiffs filed a principal brief together
8 with a multi-volume appendix (ECF Nos. 4-10);

9 On October 5, 2020, Reorganized Debtors-Appellees PG&E Corporation
10 and Pacific Gas and Electric Company (together, “PG&E”) filed a brief and an
11 appendix (ECF No. 14);

12 On October 5, 2020, Appellee Official Committee of Tort Claimants
13 (“TCC”) filed a brief and an appendix (ECF Nos. 12-13);

14 On October 26, 2020, Securities Plaintiffs filed a reply brief in further
15 support of this appeal (ECF No. 18);

16 On February 16, 2021, Appellee TCC filed a motion to dismiss the appeal
17 (ECF No. 19, the “TCC’s Motion to Dismiss”);

18 Pursuant to Bankruptcy Rule 8013(a)(3)(A), Securities Plaintiffs currently
19 have until February 23, 2021 to file a brief in opposition to the TCC’s Motion to
20 Dismiss;

21 The TCC’s Motion to Dismiss is noticed to be heard not until Thursday,
22 May 13, 2021, at 2:00 p.m;

23 This is the second request for an enlargement of time in this appeal; and
24 Securities Plaintiffs believe the requested enlargement of time will have a
25 negligible, if any, impact on the timeframe for the resolution of this appeal in light
26 of the TCC’s Motion to Dismiss hearing date being just under three months away;

27 IT IS HEREBY STIPULATED AND AGREED, by and among Securities
28 Plaintiffs-Appellants and Appellee TCC, through their counsel of record, that:

1 1. Securities Plaintiffs-Appellants shall have an additional fourteen (14)
2 days, through and including March 9, 2021, to file their brief in opposition to the
3 TCC's motion to dismiss.

4 2. Appellee TCC shall have seven (7) days, through and including
5 March 16, 2021, to file their reply brief.

6
7 Dated: February 22, 2021

Respectfully submitted,

8 LABATON SUCHAROW LLP

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Dated: February 22, 2021

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E-Filing Attestation

I am the ECF user whose user ID and password were utilized to file this document. Pursuant to Civil Local Rule 5-1(i)(3), I attest that I obtained the concurrence in the filing of this document from each of the other signatories above.

/s/ Thomas A. Dubbs
Thomas A. Dubbs

PURSUANT TO STIPULATION, IT IS SO

ORDERED. Dated: February 23, 2021

Haywood S. Gilliam, Jr.
HON. HAYWOOD S. GILLIAM, JR.
UNITED STATES DISTRICT JUDGE